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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

Ilsa Saravia, as next friend for A.H., a
 minor, on behalf of herself individually and
 others similarly situated,

Plaintiff,

v.

William Barr, Attorney General, et al.,

Respondents/Defendants.

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Case No. 3:17-cv-03615-VC

**STIPULATION AND [PROPOSED]
 ORDER RE STAY OF
 PROCEEDINGS**

RECITALS

WHEREAS, the Parties have held preliminary discussion to determine whether it is advisable to enter into mediation with the goal of reaching a mutually agreeable settlement of this case; and

WHEREAS, in furtherance of these discussions, Plaintiff has agreed to narrow her discovery requests to Defendants, and Defendants have begun responding to these narrowed discovery requests; and

WHEREAS, the Parties believe that for mediation to be successful and to promote judicial economy, it would be advantageous for the Court to defer ruling on Defendants' pending Motion to Dismiss the Second Amended Petition (ECF No. 172) ("Motion to Dismiss"), stay litigation proceedings in the case, and refer this case for mediation for purposes of attempting to resolve this matter.

STIPULATION

It is hereby agreed between the Parties, subject to the Order of the Court, as follows:

1. The Parties jointly request that the Court defer ruling on the Motion to Dismiss unless one or more of the Parties informs the Court that it or they wish to withdraw from mediation and have the Court rule on the Motion to Dismiss.
2. During the time this Stipulation remains in effect, the case, including Plaintiff's discovery requests and Defendants' responses and objections, will be stayed except for (a) the narrowed agreed-upon discovery requests to which the Parties have agreed that Defendants will respond prior to mediation; (b) proceedings, if any, to compel responses to such discovery requests; (c) mediation conducted by a United States Magistrate, or such other neutral person upon whom the Parties may hereafter agree; and (d) any proceedings concerning implementation or enforcement of the Court's preliminary injunction.

3. Any Party may at any time withdraw from this Stipulation, at which time that Party (or the Parties jointly) may so inform the Court and request that the Court rule on the Motion to Dismiss, and the stay of proceedings will automatically end.

Dated: March 7, 2019

COOLEY LLP

/s/ Martin S. Schenker

Martin S. Schenker

Dated: March 7, 2019

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN CALIFORNIA

/s/ William S. Freeman

William S. Freeman

Dated: March 7, 2019

AMERICAN CIVIL LIBERTIES UNION
IMMIGRANTS' RIGHTS PROJECT

/s/ Stephen B. Kang

Stephen B. Kang

Dated: March 7, 2019

LAW OFFICES OF HOLLY COOPER

/s/ Holly S. Cooper

Holly S. Cooper

Dated: March 7, 2019

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

/s/Christopher Dunn

Christopher Dunn

Attorneys for Petitioner/Plaintiff

Dated: March 7, 2019

UNITED STATES DEPARTMENT OF JUSTICE

/s/ Nicole N. Murley

Nicole N. Murley

Counsel for Respondents/Defendants

~~PROPOSED~~ ORDER

Upon the stipulation of the Parties, and good cause appearing, IT IS HEREBY ORDERED as follows:

1. The Court will defer ruling on the Motion to Dismiss (ECF No. 172) unless one or more of the Parties informs the Court that it or they wish to withdraw from mediation and have the Court rule on Defendants' Motion to Dismiss the Second Amended Petition.
2. The case will be stayed except for (a) the narrowed agreed-upon discovery requests to which the Parties have agreed that Defendants will respond prior to mediation; (b) proceedings, if any, to compel responses to such discovery requests; (c) mediation conducted by a United States Magistrate, or such other neutral person upon whom the Parties may hereafter agree; and (d) any proceedings concerning implementation or enforcement of the Court's preliminary injunction.
3. The stay of proceedings will automatically end at such time, if applicable, if one or more of the Parties informs the Court that it or they have withdrawn from this Stipulation.

Dated: March 8, 2019



Vince Chhabria
United States District Judge

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories.

Dated: March 7, 2019

/s/ William S. Freeman
William S. Freeman
Attorneys for Plaintiff